

REMARKS

Claims 1-4, 6-18, and 20-89 have been pending in the present application, of which claims 32-85 have been withdrawn. Claims 1, 14, and 21 are independent. Claims 1-4, 6-18, 20-31, and 86-89 have been rejected. In response, the claims have been amended to clarify the distinctions over the prior art. New Claims 90-100 have been added. New independent Claim 90 parallels pending Claim 1. No new matter has been added. Reconsideration is respectfully requested.

Rejection under 35 USC § 103

Claims 1-4, 6-18, 20-31, and 86-89 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Jacobsen et al. (U.S. 6,232,937) in view of Helms (U.S. 5,952,992). This rejection is respectfully traversed and reconsideration is requested.

The present application is directed towards a method and a system of writing an image on a liquid crystal display by automatically selecting a light source for illuminating the display based on a detected ambient light setting, writing the image to the display and flashing the selected light source to illuminate the display. As claimed, the brightness of the selected light source is adjusted based on the ambient light level. As also claimed, the color of the selected light source is automatically selected based on the ambient brightness level. For example, a “night” light source may be either a red LED or a blue green LED, depending on the use. While other colors are encompassed by the claims, a red LED could be used when it is important to maintain a person’s night vision, or a blue LED could be used when it is more important to be less detectable using night detection gear. (See Specification, p. 22, l. 16 - p. 23, l. 9.)

Jacobsen discusses a method that writes an image to a display with a plurality of pixel electrodes, and flashes a light source to illuminate the display. The current to the light source can be manually adjusted by a user to affect the intensity of the light source. However, Jacobsen does not teach or suggest automatically selecting a light source based on the ambient brightness level.

Helms is directed at automatically adjusting the brightness level of an LCD based on the ambient lighting conditions. While the Examiner cites Helms in combination with Jacobsen, no discussion is made about which elements of the present claims may be found in Helms. Nowhere

does Helms mention selecting a particular light source based on ambient light levels, nor is there any reference to multiple light sources.

Neither Jacobsen nor Helms, nor their combination, teach or suggest selecting a light source based on the detected ambient light setting. While Jacobsen's display may allow a user to vary the intensity of the light source based on the ambient level perceived by the user, and Helms may vary the brightness level of an LCD based on the ambient lighting conditions, that is not the same as the Applicants' feedback mechanism that selects both an appropriate light source and adjusts its brightness based on the ambient light level.

In apparent response to the Applicants' earlier arguments with respect to Jacobsen, the Examiner states that "in the night the LED of red always attracts to person's vision [sic] than LED of blue." The Applicants respectfully disagree and request a clarification. Nowhere in Jacobsen nor in the Examiner's response is it explained why such a statement, even if true, is relevant to the pending claims. Moreover, even if red color attracts vision more than blue, it would not render independent claims 1, 14, 21, and 90 obvious, because they recite automatically selecting the light source based on the ambient level detected with the sensor and do not in any way address how human vision reacts to the selected light source.

Because the Office Action has failed to establish a *prima facie* obviousness rejection under section 103, independent Claims 1, 14, 21, and 90 should be allowed over the combination of Jacobsen and Helms and the rejection should be withdrawn. Dependent Claims 2-4, 6-13, 15-18, 20, 22-31, 86-89, and 91-100 depend on the independent Claims 1, 14, 21, and 90, respectively, and, therefore, are patentable in view of the combination of Jacobsen and Helms for at least the same reasons as above. All claims are therefore believed to be in condition for allowance.

CONCLUSION

In view of the above amendments and remarks, it is believed that all claims are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

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